

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS**

In Re:) **Chapter 13**
Jean Marie Mitchell,) **Case No. 12-43198-HJB**
Debtor)
)
)

MOTION TO APPROVE LOAN MODIFICATION

NOW COMES Jean Marie Mitchell (hereinafter “Debtor”), by her counsel, and moves this Honorable Court to approve a loan modification offered by Green Tree Servicing, LLC (hereinafter “Green Tree”).

In support thereof, the Debtor states:

1. The Debtor's present mortgage payment, consisting of P&I and escrow, is \$1,335 per month;
2. Green Tree has offered a loan modification under HAMP, rolling the pre-petition arrears into the principal. The proposed monthly payment of P&I is \$658.94 at a fixed rate interest of 4.0%. (see exhibit 1)

WHEREFORE the Debtor prays that this Honorable Court approve the modification as offered by Green Tree.

Dated: January 10, 2014

Respectfully submitted,
Jean Marie Mitchell,
By her attorney,

/s/ James D. Lukowiak
James D. Lukowiak, Esq., BBO #644893
Law Offices of James D. Lukowiak, P.C.
1290 Worcester Road, Suite 2W
Framingham, MA 01702
Telephone: (508) 788-5500
Jlukowiak@lukowiak.com